

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

HEATHER WATTS,	}	
	}	
Plaintiff,	}	
	}	
v.	}	CASE NO. 02:06-CV-1149
	}	
HOSPITALITY VENTURES, LLC	}	
	}	
Defendant.	}	

PARTIES PROPOSED DISCOVERY SCHEDULE

I. Pursuant to F.R.C.P.26(f), a conference meeting was held and attended by:

Priscilla Black Duncan, Esq.
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Montgomery, AL 36104
Counsel for Plaintiff

Daniel S. Fellner, Esq.
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Atlanta GA 30326-1044
Counsel for Defendant

The parties do request a conference with the court before entry of the scheduling order to address: A) the proper scope of discovery; B) the deadlines for the parties to serve reports of retained experts under Rule 26(a)(2); and C) the deadline for amending the pleadings or adding parties.

2. Pre-Discovery Disclosures: The parties will exchange by April 27, 2007, all information required by F.R.C.P. 26(a)(1).

3. Discovery Plan. The parties jointly propose to the Court the following discovery plan:

All discovery will be commenced in time to be completed by December 5, 2007.

The parties will conduct discovery on liability and damages.

A maximum of 25 Interrogatories may be served by each party to any other party.

Responses due 30 days after service.

A maximum of 20 Requests for Admission may be served by each party to any other party. Responses due 30 days after service.

Each party may conduct up to a maximum of 10 depositions. Each deposition is limited to a maximum of 7 hours unless extended by agreement of parties, exclusive of experts.

Plaintiff requests that reports of her retained experts under Rule 26(a)(2) shall be due by September 14, 2007. Defendant requests that such report be due on August 1, 2007. Defendant requests that the reports of its retained experts under Rule 26(a)(2) be due forty-five (45) days after the deadline for Plaintiff to serve her expert witness reports. Plaintiff disagrees, and requests that such reports by Defendant be due thirty (30) days after the deadline for Plaintiff to serve her expert witness reports.

4. Other Items:

The parties request a pretrial conference on January 30, 2008.

Defendant requests that by August 1, 2007, the parties should be required to join additional parties and/or to amend the pleadings. Plaintiff requests that by September 14, 2007, the parties should be required to join additional parties and/or to amend the pleadings.

Settlement cannot be evaluated prior to December 15, 2007.

All potentially dispositive motions shall be filed by November 1, 2007.

Final lists of witnesses and exhibits under Rule 26 (a)(3) shall be due from Plaintiffs by Feb. 11, 2008 and from Defendant by Feb. 11, 2008, with objections due by Feb. 25 , 2008.

The case should be ready for trial by March 3, 2008, and is expected to take approximately two days.

DONE this the 11th day of April, 2007.

Respectfully submitted,

/S/ Priscilla Black Duncan
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